



MEDICAL RADIOLOGIC TECHNOLOGY BOARD OF EXAMINERS

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Licensed Practitioners
Health Professionals

Dear Sir or Madam::

Following is a form letter sent to anyone with inquiries regarding the practice of radiography or fluoroscopy. If you have further questions, please don't hesitate to call or write.

Thank you for your inquiry, it has been our experience that the most efficient method of protecting the public is to educate licensed practitioners, their staff, and the public of health care regulations, and it has been our experience that informed individuals generally try to obey the law. With that in mind, the following information describes certain provisions of the Medical Radiologic Technology Board of Examiners (MRTBE) and the Arizona Radiation Regulatory Agency (ARRA) statutes and rules. It addresses the specific acts that may or may not be performed by individuals not licensed or exempt from the MRTBE and ARRA statutes.

Only licensed practitioners or individuals licensed by the Medical Radiologic Technology Board of Examiners (MRTBE), may administer ionizing radiation for diagnostic or therapeutic purposes. Physician assistants and nurse practitioners may not administer ionizing radiation on the authority of the license of a licensed practitioner or as part of their practice acts.

During the course of a radiographic procedure, unlicensed (non-MRTBE) individuals may **not** perform any of the following acts: *position patients or the x-ray tube, set exposure factors or initiate the exposure*. Some business managers and physicians are under the false impression it is legal for their employees to perform any portion of a radiographic or fluoroscopic procedure as long as it is at the direction of, or under the supervision of a licensed practitioner. **It is not legal.** The licensed practitioner, the x-ray machine registrant (if different from the practitioner) and any technologists or other health care worker may be cited and face disciplinary sanctions if any of the above acts occur and they are in any way involved.

Additionally, the practice and supervision of radiography/fluoroscopy by the X-ray machine registrant is regulated by the statute and rules of the Arizona Radiation Regulatory Agency. Specifically, A.A.C. R12-1-603.B.1. and 2. state:

1. The registrant shall not permit any individual to engage in the practice of "healing arts radiography" using equipment under the registrant's control, unless the individual possesses a valid certificate issued by, or is exempt from, the Medical Radiologic Technology Board of Examiners, pursuant to A.R.S. 32-2801 et sec.
2. **The registrant shall maintain records documenting compliance with R12-1-603.B.1. for each individual using equipment under the registrants' control practicing "healing arts radiography".**

The ARRA rules also define the specific acts which comprise the practice of radiography/fluoroscopy. R12-1-602.27 states:

"healing arts radiography" includes any or all of the following acts:

- a. positioning the x-ray beam with respect to the patient;
- b. anatomical positioning of the patient;
- c. selecting exposure factors; or
- d. initiating the exposure.

Also, unless exempted, uncertified individuals may not perform any of the above tasks while providing *assistance* with a radiographic procedure. MRTBE rule R12-2-101.1. provides:

"Assistance" means any activity **except** the following: Positioning the patient and x-ray tube, setting techniques, and actual exposure.

Therefore, only persons certified by or exempt from the Board may position the patient, the tube, set technical factors or initiate the exposure for a radiographic/fluoroscopic exam.

Only licensed practitioners, ie., MD, DO, Dentist, Chiropractor, Podiatrist, and Naturopath, are exempt and may perform the actions described above without certification by the MRTBE.

The scope of practice for radiologic technologists versus practical technologists is considerably different. Radiologic technologists (RT) are not limited in the type of radiographic or fluoroscopic exams they may perform. Practical technologists are strictly limited to performing radiographic examinations of the chest and extremities. The chest may only be x-rayed to visualize the heart and lungs. The extremities are defined as the lower 2/3 of the humerus distally to the phalanges and the lower 2/3 of the femur

distally to the phalanges. Practical technologists are also prohibited from performing any exam involving the use of contrast media or fluoroscopy.

The MRTBE and the Boards of Medical Examiners, Nursing, and boards of other health professions work in a cooperative effort to protect the public and to assure health professions laws are not violated. Should it be determined a violation has occurred and another health professional has contributed to the violation, it is the policy of the MRTBE to forward a complaint to the appropriate Board.

I hope this letter clarifies the law regarding the practice of radiologic technology. If it does not, please don't hesitate to contact me.

Sincerely,

John M. Gray, MA, BSRT, (ARRT)
Executive Director

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